REMARKS

Claims 5-10 and 20-22 are amended to correct claim dependencies. Claim 23 is amended to correct a typographical error of a self-evident nature. Claims 6, 8, and 10 are further amended to cure the Examiner's § 112 rejection. Claim 19 is amended to recite managed objects storing current configuration data stored in the database. Support for this amendment is found throughout the Specification, in Figs. 2, 3, and 4, and at least claims 1, 11, and 23. No new matter is added.

The Examiner rejected claims 1, 11, 19, and 23 under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,662,208 to Moeller, *et al.* Moeller discloses maintaining a registration database 26 in a switch 12 that connects *e.g.* an Ethernet network 14 with an ATM network 16. The registration database 26 dynamically maintains the state of the Emulated LAN (ELAN) – that is, which ATM devices 17 are currently connected to the Ethernet network 14, along with information related to the ATM devices 17 such as ATM address, Ethernet address, ATM channel information, and the like. ATM devices 17 are added to the registration database 26 as they join the ELAN, and are removed from it as they disconnect from the ELAN. Col. 4, line 42 – col. 5, line 5. The registration database 26 does not store any historical information, such as the number of times an ATM device 17 has joined the ELAN. Col. 5, lines 5-8.

Moeller discloses maintaining an additional database by which to ascertain this historical information, to enable more intelligent management of the ELAN. Periodically (on a polling interval basis), information regarding ATM devices 17 of interest are extracted from the registration database 26 and stored in a separate history database 30, which maintains historical configurations for the ATM devices 17. col. 5, lines 18-40. This periodic update is the only synchronization between the two databases 26, 30. Even if the full registration database 26 is updated to the history database 30 at every polling interval, it is clear to those of skill in the art that the history database 30 will be accurate regarding the current status of the ELAN only

7

momentarily (if that – indeed, the state of the ELAN and hence the registration database 26

could change in the time it takes the messaging to complete the update, so the history database

30 may already be stale, at least for ELAN modifications that occur at or immediately following

the polling trigger). Moeller provides tools for managing this disconnection between the

registration database 26 and history database 30. In particular, a status monitor in the form of

network GUI 56 (Fig. 5) accesses the registration database 26 and history database 30 for each

monitored ELAN, and provides colored blocks 64, 66 to indicate the change status of the ELAN.

For example, a red block may indicate that the associated ELAN has lost an ATM device 17

(information obtained from the registration database 26) as compared to the last check of the

history database 30; a yellow block may indicate some configuration parameter of an ATM

device 17 has changed. col. 8, lines 9-17.

In contrast, claim 1 recites both the current state of a network and historical information

being maintained in a single database. Claim 1 recites, "storing current configuration data ... in

a database ..." The claim then recites, "storing historical configuration data ... in said database

..." The antecedent of "said" is clearly the previously recited database. Similarly, claim 11

clearly recites a single database, comprising "current configuration data ... and historical

configuration data." Claim 23 also clearly recites a single database storing the current

configuration of the managed objects, "and one or more changed objects stored in said

database, wherein each changed objects represents a past configuration of one of said

managed objects." As amended, claim 19 recites a single database comprising both managed

objects storing current configuration data and changed objects storing historical configuration

data.

The difference between these claims and Moeller is far more than semantic. The

significant benefits that accrue from maintaining both current and historical network

configuration data are discussed extensively in the Specification, at page 7, line 13 – page 9,

line 2. The ability to explore a mix of current and selectively "rolled back" changed

configurations is much more difficult, if indeed it is possible at all, when the current and historic configuration data reside in separate, unsynchronized databases, as opposed to the novelty of the present invention maintaining all changed versions of a managed object in the same database. See, *e.g.*, Fig. 4, depicting three versions of cell C_2 stored together in the same database.

The Examiner rejected various dependent claims as being unpatentable under 35 U.S.C. § 103 over Moeller in view of U.S. Patent No. 6,338,070 to Nusch, et al., or alternatively by various hypothetical modifications to Moeller. To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP § 2143. Without addressing the veracity of the Examiner's assertions regarding the teachings of Nusch or the obviousness of the proffered modifications to Moeller, Applicant notes that every dependent claim includes each and every limitation of its respective parent claim(s). As noted above, Moeller fails to teach or suggest maintaining both current network configuration data and historical configuration data in a single database, an express limitation of independent claims 1, 11, 19, and 23.
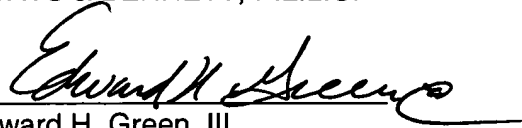
Nusch does not cure this defect. Nusch discloses grouping managed objects in a MIB into groups, and updating the MIB on a group basis as network elements change. Only the changed version is stored, so that the network configuration may be restored after a system failure. Nusch, col. 2, lines 35-54. Nusch does not teach or suggest maintaining both current network configuration data and historical configuration data in a single database.

As no art of record, alone or in combination, teaches or suggests the express limitations in claims 1, 11, 19, and 23 of storing current and historical configuration data in a single database, the Examiner has failed to establish a *prima facie* case of obviousness.

All pending claims as amended herein exhibit requisite novelty and nonobviousness over the art of record and are in condition for allowance. Accordingly, Applicant respectfully requests prompt allowance of all pending claims.

Respectfully submitted,

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10